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4 CHASOM BROWN, et al.,
5 Plaintiffs,
6 v.
7 GOOGLE LLC,
8 Defendant.

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10 PATRICK CALHOUN, et al.,
11 Plaintiffs,
12 v.
13 GOOGLE LLC,
14 Defendant.

15 Case No. [20-cv-03664-LHK](#) (SVK)
16 20-cv-5146-LHK (SVK)

17 **ORDER RE DEPOSITION OF**
18 **LORRAINE TWOHILL**

19 Re: Dkt. No. 355 (*in 20-cv-3664*)

20 In the *Brown v. Google* action, the Court is in receipt of the Parties' submission regarding
21 the deposition of Chief Marketing Officer Lorraine Twohill. Dkt. 355. Plaintiffs argue that
22 Ms. Twohill has unique, personal knowledge of relevant issues and that less intrusive means of
23 discovery have been exhausted; Plaintiffs' position is supported by citations to documents
produced in this action. Defendant seeks to shield Ms. Twohill as an apex deponent, taking issue
with Plaintiffs' interpretation of cited documents. Having carefully considered the Parties'
submission, the Court **GRANTS IN PART** Plaintiffs' request under the following conditions:

24 • The *Brown* Plaintiffs may depose Ms. Twohill. The deposition shall not exceed 4.0
25 hours of testimony;
26 • In the event the *Calhoun* Plaintiffs intend to seek the deposition of Ms. Twohill, the
27 date for the deposition must be coordinated such that the witness sits for deposition
28 only once, unless the witness chooses separate dates. In the *Calhoun* action, an

1 independent showing under the apex standard will be required, and any time
2 allowed for deposition will be in addition to the time allowed in the *Brown* matter.

3 **SO ORDERED.**

4 Dated: December 20, 2021

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7 SUSAN VAN KEULEN
United States Magistrate Judge